#### **SDMS US EPA REGION V -1**

# SOME IMAGES WITHIN THIS DOCUMENT MAY BE ILLEGIBLE DUE TO BAD SOURCE DOCUMENTS.



DATE:

December 12, 1979

TO:

Division File

FROM:

P. M. McCarthy

SUBJECT:

St. Clair County - LPC 163 121 01 - Sauget/Sauget Note: Refer to attached sketches for details.

On December 6 and 11, 1979, I inspected the subject site to determine compliance with PCB Order # 77-84, dated August 24, 1978. The order directed the placement of final cover over 20% of the site during each six month period. Therefore, as of August 24, 1979, 40% should be final covered. (50% by November 24, 1979.) As of the date of this memo, it is estimated that less than 5% of the site has final cover, and a portion of that is merely stockpiled. This figure is based on the following:

a) diggings made these two dates

- b) conversation with Paul Sauget on October 9, 1979 at which time he stated that the only final cover hauled in, is in the extreme southern portion of the northern site (stock-piled), and further that he has hauled only "a few loads in 1979"
- c) personal knowledge of the site and its basically dormant state
- d) two surface and underground fires on the southern site (9-76 and 10-79)

Since the close of the landfill, a coal unloading operation has begun by the Pillsbury Company. On December 11, 1979, Russell Selph, manager of the facility, stated that the recent filling operation on the northern site was done by him. He stated that the filling had ceased and would not resume without a permit. He also stated that the current fill face was approximately the old road on the south end of the fly ash pit, making it the 1966 line. I explained to him that the past landfill operator is under PCB Order to apply final cover and that any operations that alter the land would only complicate matters. He said that his company, Pillsbury, has leased 83 acres of this tract from Eagle Marine Industries, and has no plans to make any major changes.

The attached maps indicated the approximate location and depths of borings which determine the amount of cover, and other pertinant data. It should be noted that this summer and entire fall season, has been dry and would have been ideal for final covering operations.

PMM:jlr

cc: Enforcement Services - Stan Parsons (w/attachments)<sup>†</sup>
Southern Region
FOS Manager

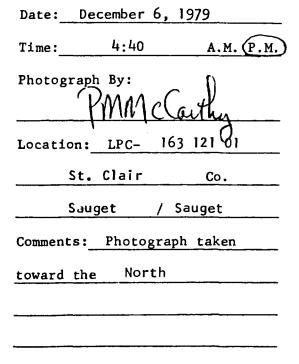
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E.P.A. - D.L.P.C. STATE OF ILLINOIS

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St. Clair Co.				
Sauget / Sauget				
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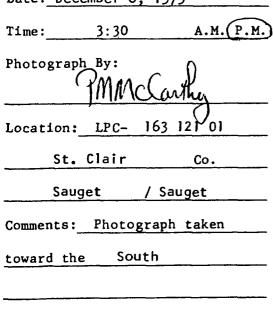
St. Clair Co.

Sauget /Sauget

Comments: Photograph taken
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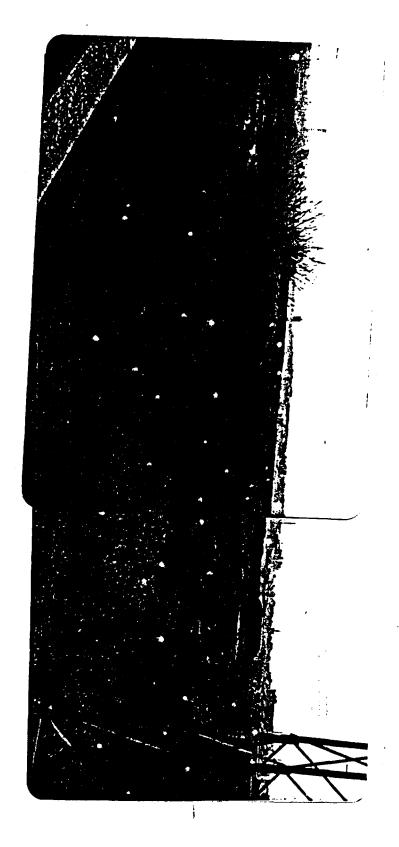




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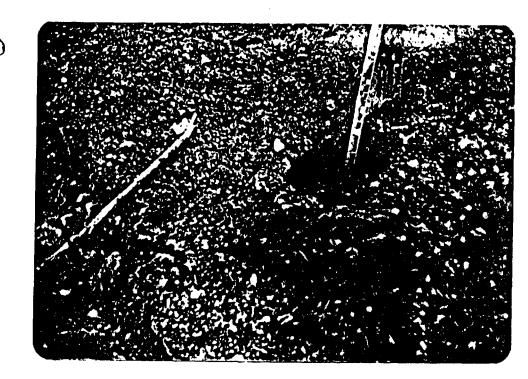
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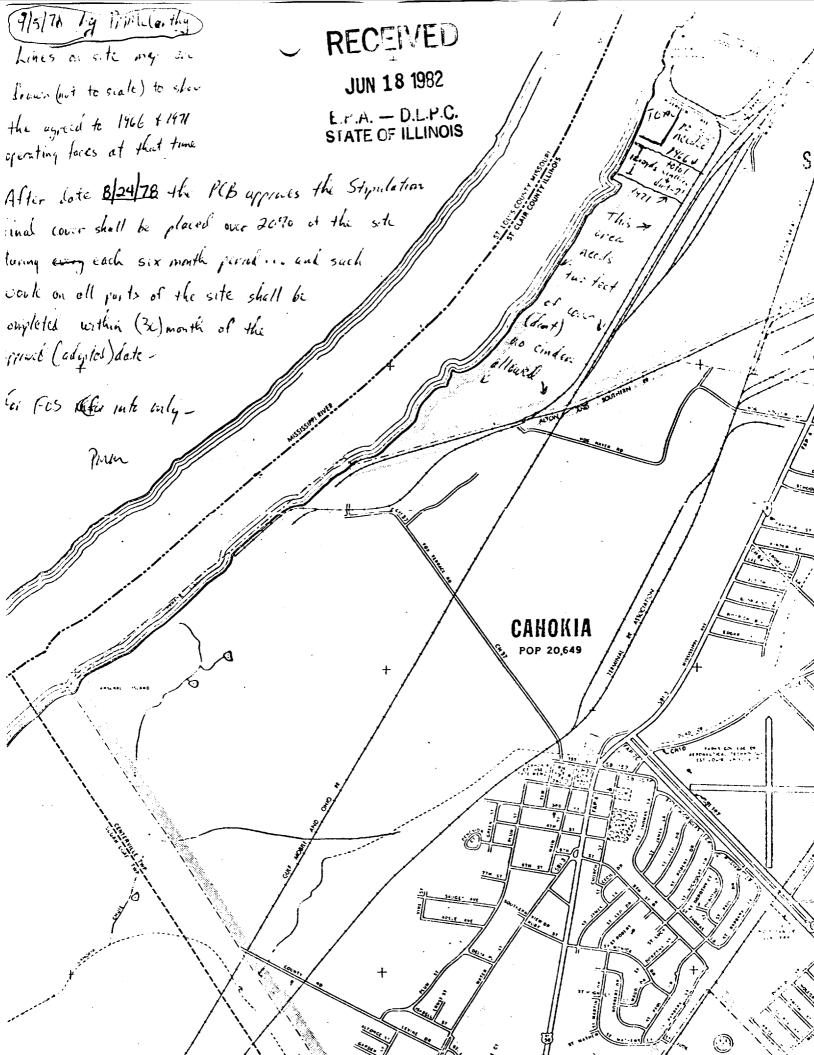
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#### Illinois Environmental Protection Agency

(217) 782-9469

January 26, 1978

RECEIVED

JUN 18 1982

Ms. Ann L. Carr
Assistant Attorney General
Environmental Control Division
Southern Region
Attorney General's Office
State of Illinois
500 South Second Street
Springfield, IL 62706

E.P.A. — D.L.P.C. STATE OF ILLINOIS

RE: EPA vs. Paul Sauget et al: PCB 77-84 St. Clair County Sauget/Sauget

Dear Ann:

The test results show that all the materials proposed are unacceptable as cover. The permeability (K) alone is sufficient to determine this factor. All materials tested are  $9.92 \times 10^{-3}$  or greater. This is unacceptable as it will result in large amounts of infiltration into the refuse below the cover. This would lead to increased leaching of contaminants from the refuse.

In addition, Table II shows that all materials tested are rich in heavy metals as analyzed by atomic absorption. The result of lead and zinc would cause some of the samples to be considered as a special waste by our Hazardous Waste Unit. These materials would require a supplemental permit for landfill deposition.

Respectfully,

William C. Child

Manager, Field Operation Section Division Land Pollution Control

William E. Chico

WCC:dsd cc: Tom Chiola Ken Mensing Scott Miller

KM

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\*Analyses are to be performed on unfiltered samples. \*Values exceeding no. of places shown are reported in the lab comments section; tests requested but not run should also be explained in the lab comments section.

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### DIVISION OF LAND/NOISE POLLUTION CONTROL CHEMICAL ANALYSIS FORM

CHEMICAL ANALYSIS FORM						
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(2) Mid-site (2) Private well						
(3) Downstream (3) Spring	(3) Callection (3) Other					
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<sup>\*</sup>Analyces are to be performed on unfiltered camples. \*Values exceeding no. of places shown are reported in the lab comments section; tests requested but not run should also be explained in the lab comments section.

ST. CLAIR COUNTY - Sauget Landfill

TO: Division of Water Pollution Control, Surveillance Section

FROM: Michael G. Neumann, Engineer, Mississippi Direct Sub-Unit

DATE: March 30, 1973

INTERVIEWED: Bob Daily, Supervisor

Unknown Landfill Employee

On the above date, Sanitarian James Kammueller and the writer visited the Sauget Landfill to determine what effect the high river stage of the Mississippi was having on the landfill. The river stage at St. Louis on that date was 37.5'. The visit was made in response to a report from Bill Baker of the State Water Survey who stated that the river was covering part of the landfill and that trash was floating downriver for miles.

First the site of the main dumping area was visited. This is the site of the original landfill. It is adjacent to, upstream from, and at a higher elevation than the newer site which was under water. Bob Daily, a supervisor, was contacted. He stated that landfill employees had been constructing a fence downstream from the lower level landfill in an attempt to prevent floating trash from traveling downstream. He thought about 1,500' of fence had been installed. He did not believe that there was any danger of the higher level landfill flooding. Observation of the site indicated that this was probably true if the river did not rise much more than the projected additional foot or two.

Observations were then made of the flooded lower level landfill. Large amounts of assorted debris and some oil were floating on the water's surface and were being carried downstream. A fence had been constructed along the downstream boundary with trash piled up against it. An employee of the site, who refused to identify himself, stated that about 1,300' of fence 5' high had been constructed but that the river was threatening to flood over the top of the fence. The water level was only about 1' from the top. He stated water had first started flooding the landfill at about 4:00 PM the previous day, March 29. The fence was already down in spots but the employee reported that the current was too strong to make the necessary repairs or raise the height of the fence. Large amounts of trash were passing through the fence where it was down and floating downstream. Pictures of the area were taken.

The river was then traced along the levee downstream about two miles to the vicinity of the Cahokia Sewage Treatment Plant. Scattered debris from the land-fill was observed along the entire distance. Trash was observed collecting against trees and brush. Additional pictures were taken.

A check with the DLPC, Collinsville Office, revealed that they were keeping the situation under surveillance and were incorporating the present incident into a previous referral that had been submitted on the landfill.

Sanitarian Kammueller and the writer again visited the landfill site on April 2. Conditions were generally the same as on the previous visit. However, the river stage was now 38.9'. Most of the fence was under water. Offensive garbage odors were coming from the water covering the landfill and downstream from it. A strong wind was holding much of the trash against the levee. Oil was also observed on the water's surface. Again the water was traced two miles downstream and again trash was observed the entire length floating down the river and collecting against trees and brush.

The following is a list of apparent violations:

RULE	STATEMENT OF RULE
Environmental Protection Act Section 12(a)	No person shall cause water pollution or violate regulations adopted by the Pollution Control Board.
Environmental Protection Act Section 12(d)	No person shall deposit contaminants upon the land so as to create a water pollution hazard.
Water Pollution Regulations of Illinois Rule 203(a)	All waters of the State shall be free from floating debris, visible oil, and odor.

Since the DLPC has a complaint against the owners of the landfill, it is suggested by copy of this memo that the aforementioned water pollution violations be included in said complaint.

M. J. Mumann

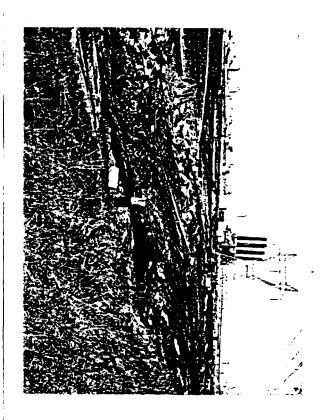
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cc: Mississippi Basin

cc: DLPC - Collinsville Office

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DECEMBER 28, 29, 1967
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C 2-	1 Suget		(19)	(20) Letter Sent (Yes or N	( (23)
(Location)	(Responsibl	e Party)		Letter Sent (les of N	(26)
Samples Taken: Yes (#			Λ m	Weather	(20)
Ground Water(#)() Surf	ace (#1) Other (# )	TO TO	· <del>· · · · · · · · · · · · · · · · · · </del>	Wedericz	
Photos Taken: Yes (#)	The second	10 - T - C	- 응구 #	Inspector	1
Photos laken: les (#	// NO ( ) Interv	Temed	· · · · · · · · · · · · · · · · · · ·	$\frac{1}{(27)}$	(29)
D Turnation	Daniel Daniel	C			• •
Previous Inspection '		ous Correspond	dence		
OPERATIONAL STATUS:	TYPE OF OPERA		a ( )	AUTHORIZATION:	( )
Operating ()	Sanitary Land		Storage ( )	E.P.A. Permit	
Temporarily Closed ()	Random Dump	• •	Salvage ()	Variance	
Closed Not Covered (X)	Other	<del></del> ' '	A.C.D. ()	21 (d)	( )
Closed and Covered ( )	Quantity Rece	ived Daily(1		Board Order	( )
			(30)	Illegal (5)	())
		SITE EVALUAT			(31)
- Flow leaving	g site $(1-3)$				. 38
Soard Order: Violation	n observed (5)	7-11-81			. 39
ourt Order: Violation	n observed (5) $\_$ $\_$				. 40
ermit: One violation	on (5)				41
	violation(s) (2)				42
aily Cover: Not provi			use(5)		• •43
Not provided	l on previous opera	ting $day(4)$ .			44
Inadequate d	lepth over area $\geq$ 3	days operati	ion(3)		. 45
Inadequate d	lepth over area≤2	days operati	lon(1-2)		. 46
ntermediate Cover: In	nadequate depth in :	required area	s in acres(	1-3)	. 47
inal Cover: Inadequat					
Inadequate d	lepth 3 or more acre	es(4)			. 49
Refuse not deposited	at toe of slope()	) ,	$\neg$		
Inadequate spreading	and compacting ( )	)	\		
Insufficient operabl	e equipment on site	e as required	() <b>)</b> —(2 ea	. 2-8)	. 52
Operational roads un	satisfactory ( )	-			
Blown Litter(), dus	t nuisance observed	l( ), Odor de	tected( )	(1 ea. 1-3)	53
Burning (4)		•			54
Liquids() Solids()	not permitted (5)			South Elo	55
Inadequate site rest	riction(X) Site cor	ncealment( )	(2 ea. 2-4)	) £041" £40.	56
Inadequate: Shelter(	) Sanitary Facilit	ies( ) Emerg	ency Commun:	ications( )(1 ea. 1-3)	.57
cavenging by: Oper	ator()Others()	bserved $(1-3)$	)		58
alvaging Observed(	): Improperly condu	cted in: Loc	ation()Oper	ration( )Storage( )(l-	-3)59
vidence of vectors	observed ( ) (1-3).				. 60
her (1-3)					61
				(	)
					,
			Signature	does not necessarily	imply
			agreement	with the report.	
			-		
			0.1		
1			Signature	Owner/Operator	
				owner/operator	



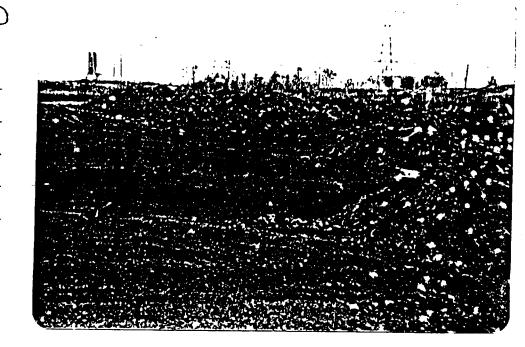
## ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS INTER-OFFICE CORRESPONDENCE

•					
DATE: 10 28 81					
MEMO TO: File # 16312101					
$\mathcal{O}(\mathcal{O}(\mathcal{O}))$					
FROM: Tank Carthy					
SUBJECT: Clair COUNTY - D.L.P.C. Inspection					
Sauget 1 Sauget					
Determine was P.C. Illian of this office some on this inspection- Observed that this site is not in compliance with  PCR. 77-84-All filled areas were to be final exercis by  Feb. 24. 1981 houses no access of spread and loveled court  were observed - Active operations continue in the incention					
Note the leading was PCR-77-84-All filled areas were to be final (Never by					
first abserved on 10/12/81 - Feb. 24,1981 howers no access of spread and loveled cover were observed - Active operations continue in the morthern					
hard analog and were observed - Active operation continue in the inerthern					
interview: preting of the nothern site-Praction dumping continues of the northern site-Praction dumping continues of the northern site-northern site-					
interview: portions if the northern site - handon dumining continues is					
to bear the Observed and complet leached at pent (A)					
Acceptable - Checold appropriate the flow sous and					
A line begins and complet touchait at pent (A)  14 pre begins and photographed - was the sunt into the  Acceptage - Cheered a language of the flow sols, and  continuous appearantly fore their - 10 is other to have an					
DIAGRAM: LECT SITC FUEL LPC-					
I ( PILSEURY )					
S - CONTROL DINCE /					
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1 / Stockard 1 - 4 EUCE					
Cover 1					
1 V Arco					
R / Kandon					
Some RAD Dumoing					
W SITE					



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		$\sim$ (	$\bar{1}$ )	(8)	$\overline{9}$ ),		,	-	
	INSPECTI	ON REPORT -	SITE INV	ENTORY NO	$\frac{1631}{(11)}$	$\leq L C_{(18)}^{\prime}$	)	**	
St. Claus	co	L.P.C.		Region #_	· ·		ate 10/2		
Sauget	1	Sawet		•	•	letter	(20) Sept (V	(25) es or No)	
(Location)		(Responsi						•	(26)
Samples Taken: Ye Ground Water( ) Su	es ( ) No	(X) T	ime: Fro		$\frac{D}{\sqrt{m}}$	Weathe	r <u>49</u>	<u> </u>	
Photos Taken: Ye	es (X) No	() I	nterviewe	d 45 CV	> L' f = <u> </u>	Inspec	tor $\mathcal T$	M	M
Previous Inspection	- 10/16/	1 <i>16</i> Prov	ious Corr	o coon don a	1/17	100 01	(27)	) Y = = ( )	(29)
OPERATIONAL STATUS		TYPE OF O			e <u> 1611 4</u>	31		Yes( )   ZATION:	NO(V)
Operating	( )	Landfill Random Du		$\aleph$	Storage	( )		Permit (	)
Temporarily Closed Closed Not Covered		Other	mp	()	Salvage A.C.D.	( )	Variance 21(e)		) )
Closed and Covered	()	Quantity	Received	Daily(1-6			Board On		)
IMPROVED	÷				(30)	•	Illegal	(3) (X	$\frac{3}{(31)}$
SAME								•	-
	•								T
DETERIORATED				4	•	;	I S		62)
GENERAL REMARKS	: No e	vidence	of any	humine	, - all	the c	inders	that ha	1
been stacks	ried have	ctock alol	applied!	to the	v paces	alras.	<u>- ≈15 /</u> 1	als of	<u></u>
P 1 +		-/	+ 1		· · · · · · · · · · · · · · · · · · ·	77.770			
Landa Alex	rying (i	n trucies a	I The	Pet the	end -	<del> </del>			<del></del>
	-0:/	· 1. 17							
SILE WILL TH	e rech	CCKCX	117640	next	is we	CKS T	e (int	(K1 75	<u> </u>
INTERVIEW: HIE	is out.	-		·		· · · · · · · · · · · · · · · · · · ·		· ·	
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							RECE	W.D	
DIAGRAM:									
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						j.:	57	J. P.C	
							TALE OF	ILLINOIS	
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				]   ]					
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Date:	October 22,	1979
Time:_	5:15	A.M. (P,M.
Photogr	raph By: PMA	Clarky
Locatio	on: LPC- 16	3 121 01 0
	St. Clair	Co.
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toward	the North	
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	-	Co.
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PC-5 (Rev. 6-75-500)

ENVIRONM "TAL PROTECTION AGENCY

STATE

Signature \_\_\_\_\_\_Owner/Operator